

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket Nos. 360, 651, 657, 941, 1014 &
1018**

**NOTICE OF FILING OF FURTHER REVISED PROPOSED ORDER (I) CONFIRMING
THIRD MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF LORDSTOWN
MOTORS CORP. AND ITS AFFILIATED DEBTORS AND
(II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on September 1, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 360] (the “**Plan**”) with the with the United States Bankruptcy Court for the District of Delaware Court (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that, on November 1, 2023, the Bankruptcy Court entered the *Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with the Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [Docket No. 651].

PLEASE TAKE FURTHER NOTICE that, on February 27, 2024, the Debtors filed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1014].

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

PLEASE TAKE FURTHER NOTICE that, on February 27, 2024, the Debtors filed the *Notice of Filing of Proposed Order (I) Confirming Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* [Docket No. 1018] (the “**Proposed Confirmation Order**”)

PLEASE TAKE FURTHER NOTICE that, the Debtors hereby file the further revised *Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* (the “**Revised Proposed Confirmation Order**”), attached hereto as **Exhibit A**

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Revised Proposed Confirmation Order to the Bankruptcy Court for approval at the hearing scheduled for **March 5, 2024, at 3:00 p.m. (prevailing Eastern Time)** before the Honorable Mary F. Walrath (the “**Confirmation Hearing**”).

PLEASE TAKE FURTHER NOTICE that for the convenience of the Court and all parties in interest, a blackline of the changed pages of the Revised Proposed Confirmation Order against the Proposed Confirmation Order is attached hereto as **Exhibit B**,

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to amend, revise, modify or supplement the Revised Proposed Confirmation Order prior to, at, or as a result of, the Confirmation Hearing.

Dated: March 1, 2024
Wilmington, Delaware

/s/ Morgan L. Patterson

WOMBLE BOND DICKINSON (US) LLP

Donald J. Detweiler (DE Bar No. 3087)

Morgan L. Patterson (DE Bar No. 5388)

1313 North Market Street, Suite 1200

Wilmington, Delaware 19801

Telephone: (302) 252-4320

Facsimile: (302) 252-4330

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)

Matthew C. Brown (admitted *pro hac vice*)

Fan B. He (admitted *pro hac vice*)

200 South Biscayne Boulevard, Suite 4900

Miami, FL 33131

Telephone: (305) 371-2700

tlauria@whitecase.com

don.detweiler@wbd-us.com
morgan.patterson@wbd-us.com

Counsel to the Debtors and Debtors in Possession

mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

Counsel to Debtors and Debtors in Possession